REMARKS

Reconsideration of the application in view of the above amendments and the following remarks is respectfully requested. Claims 28-40, 42-45, and 53 have been canceled. Claims 2, 16, 23-27, 47, 50, and 54 have been amended. Claims 55-61 have been added. Claims 1-27, 41, 46-52, and 54-61 are currently pending in the application.

CLAIM REJECTIONS - 35 U.S.C. §102

In the Office Action, the Examiner rejected claims 1-35, 37-43, 45-47 and 49-54 under 35 U.S.C. §102(b) as being anticipated by Gupta et al. (U.S. Patent No. 5,913,061). Claims 28-40, 42-45, and 53 have been canceled. With regard to claims 1-22 and 46-49, this rejection is respectfully traversed. With regard to claims 23-27, 41, 50-51, and 54, these claims have been amended to claim the invention more distinctly. Each of the pending rejected claims will be addressed below.

Independent claim 1

Claim 1 recites:

A scalable enterprise application collaboration system comprising: a central host including a fault tolerant central registry system having a first central registry and a redundant central registry, wherein the central host is configured to manage a plurality of reusable distributed objects, send configuration change alerts to the plurality of reusable distributed objects, and provide configuration data to the plurality of reusable distributed objects from one of the first central registry and the redundant central registry, wherein if the first central registry is unavailable, the redundant central registry is used;

the plurality of reusable distributed objects, wherein the plurality of reusable distributed objects are in communication with the central host to receive configuration change alerts and to download configuration data from the central host's fault tolerant central registry system; and

a plurality of heterogeneous applications, wherein the plurality of heterogeneous applications are configured to communicate via the plurality of reusable distributed objects in accordance with the configuration data.

In particular, claim 1 specifies that the central host includes "a fault tolerant central registry system having a first central registry and a redundant central registry", and that the central host provides "configuration data...from one of the first central registry and the redundant central registry, wherein if the first central registry is unavailable, the redundant central registry is used". Such a fault tolerant central registry system is neither disclosed nor suggested by Gupta.

In support of his rejection of claim 1, the Examiner cites the following excerpts from Gupta: Col. 3, lines 60-65; Col. 4, lines 2-6; and Col. 22, lines 10-24, contending that these excerpts teach the fault tolerant central registry system of claim 1. Applicants respectfully submit that these excerpts do not teach what the Examiner contends. Instead, the cited excerpts teach an interchange server having reliability, availability, and serviceability features (RAS features). From Col. 10, lines 22-24 of Gupta, it is specified that the RAS features include upgrading, reporting and diagnosing bugs, performance monitoring, and tuning (notice that these features DO NOT include fault tolerance). The cited excerpts also disclose that multiple cooperating interchange servers can run on different operating platforms. From his reliance on these excerpts, it appears that the Examiner is equating multiple cooperating interchange servers, each having RAS features, with fault tolerance. This is an incorrect conclusion.

In Gupta, it is true that multiple interchange servers can cooperate (i.e. communicate) with each other. It is also true that each interchange server maintains a registry. It is not true, however, that the multiple interchange servers cooperate to implement a redundant and fault tolerant registry. In Gupta, each interchange server

maintains its own registry. If that registry is down or unavailable for whatever reason, the interchange server that maintains that registry <u>cannot</u> obtain the configuration information stored in the unavailable registry from a registry maintained by another interchange server. Even if it tried to do so, the interchange server would not receive the correct configuration information from the other interchange server because the configuration information in the registry maintained by the other interchange server would not be the same as the configuration information in the unavailable registry. There is nothing in Gupta that teaches that the multiple interchange servers cooperate to maintain a redundant and fault tolerant registry, and there is no teaching whatsoever that if one registry is disabled, another registry maintained by another interchange server may be consulted to obtain the same configuration information. Overall, there is no teaching in Gupta of a fault tolerant registry. For at least this reason, Applicants submit that claim 1 is patentable over Gupta.

<u>Independent claim 2</u>

Claim 2, as amended, recites:

A method of centrally managing distributed components comprising: storing in a first computer system a central registry database including configuration information related to distributed components wherein the distributed components are located in remote computer systems;

receiving requests from the distributed components in an enterprise application system for configuration information updates, each distributed component communicating with one or more enterprise applications;

determining configuration changes to be implemented in one or more distributed components of the distributed components in response to the requests; and

transferring the configuration changes to the corresponding distributed components wherein the configuration changes are implemented in the corresponding distributed components.

According to claim 2, requests are received from distributed components for configuration information <u>updates</u>. In response to these requests, a determination is made

as to what configuration <u>changes</u> need to be implemented by the distributed components. Then, the configuration <u>changes</u> are transferred to the distributed components to enable the distributed components to implement them. By determining and transferring configuration <u>changes</u> to the distributed components in this way, the method of claim 2 makes it possible for the distributed components to receive configuration updates in increments, and to implement the configuration changes in increments.

Such a method is neither disclosed nor suggested by Gupta. In Gupta, it is possible for connectors (distributed components) to generate configuration requests (Col. 11, 41-43). It is also possible for the configuration service of the interchange server to receive these requests and to execute them, causing results to be returned to the senders of the requests (Col. 11, lines 47-50). However, unlike the method of claim 2, the configuration service of Gupta does not determine, in response to the configuration requests, what configuration changes are to be implemented in the distributed components. From the Gupta disclosure, it is not clear what the configuration service actually does to execute the configuration requests. What is clear, though, is that there is no specific teaching in Gupta that the configuration service determines, in response to the configuration requests, what configuration changes are to be implemented in the distributed components.

Applicants' assertion that this limitation of claim 2 is not specifically taught by Gupta is bolstered by the fact that, in his rejection of claim 2, the Examiner cited no portion of Gupta as showing this limitation. Applicants can only conclude from this lack of citation that the Examiner was also unable to find any specific teaching of this limitation in Gupta; thus, it can be concluded that no such teaching exists. Since Gupta

fails to disclose at least this limitation of claim 2, Gupta cannot anticipate claim 2. For at least this reason, Applicants submit that claim 2 is patentable over Gupta.

Applicants further submit that claims 3-8, 46-47, and 49, which depend from claim 2 and which recite further advantageous aspects of the invention, are likewise patentable over Gupta for at least the reasons given above in connection with claim 2.

Independent claim 9

Claim 9 recites:

A method of centrally managing distributed components comprising: receiving at a first computer system data translation and messaging configuration information from a configuration information input module wherein the configuration information is accessed and modified by a user and sent to the first computer system;

determining configuration changes to be implemented in response to the data translation and messaging configuration information;

modifying a central registry database to reflect at least a portion of the configuration changes, wherein the central registry database is in the first computer system;

allocating the configuration changes to corresponding distributed components located in remote computer systems; and

transferring the configuration changes to the corresponding distributed components wherein the configuration changes are implemented in the corresponding distributed components.

With regard to this claim, Applicants respectfully submit that the Examiner has failed to meet his burden of establishing a prima facie case of unpatentability.

Specifically, in his rejection of claim 9, the Examiner failed to cite any portion of the Gupta reference as showing the "determining" and "allocating" limitations of the claim. Without such citations, the Examiner has failed to meet his burden of showing that each and every limitation of the claim is taught by the reference. Accordingly, Applicants request that the rejection of claim 9 be withdrawn.

Applicants also request that the rejection of claims 10-15, which depend from claim 9, also be withdrawn.

Independent Claim 16

Claim 16, as amended, recites:

A method of centrally managing distributed components comprising: storing in a first computer system a central registry database containing configuration information related to a first distributed component located in a first remote computer system and a second distributed component located in a second remote computer system, wherein the first distributed component communicates with a first enterprise application and the second distributed component communicates with a second enterprise application;

receiving requests from at least one of the first distributed component or the second distributed component in an enterprise application system for a configuration update;

determining configuration changes to be implemented in response to the requests; and

transferring the configuration changes to at least one of the first distributed component or the second distributed component wherein the configuration changes are implemented on at least one of the first distributed component or the second distributed component.

Claim 16 is somewhat similar in substance to claim 2. Like claim 2, it also comprises a "determining configuration changes" limitation. As argued above in connection with claim 2, Gupta fails to specifically teach such a limitation. Also, as with his rejection of claim 2, the Examiner fails to cite any portion of Gupta as teaching this limitation. Thus, Applicants respectfully submit that such a limitation is not taught by Gupta. Since Gupta fails to disclose at least this aspect of claim 16, Gupta cannot anticipate claim 16. For at least this reason, Applicants submit that claim 16 is patentable over Gupta.

Applicants further submit that claims 17-22, which depend from claim 16 and which recite further advantageous aspects of the invention, are likewise patentable over Gupta for at least the reasons given above in connection with claim 16.

Independent Claim 23

Claim 23 has been amended to recite:

A distributed enterprise application integration system comprising:

a central control module stored in a first computer, the central control module including a central registry database used to store configuration data about a distributed enterprise application system, wherein the central control module is configured to process requests for component configuration updates from a plurality of distributed components, determine component configuration data changes in response to the requests, and forward the component configuration data changes to the distributed components; and

the plurality of distributed components including corresponding component control modules, the plurality of distributed components stored on a plurality of computers, wherein the plurality of distributed components are configured to communicate with one or more enterprise applications and perform data related and messaging activities in compliance with component configuration data, and wherein the component control modules are configured to implement component configuration data changes and communicate with the central control module to receive component configuration data changes, send requests for component configuration updates, and send changes to the central registry database.

In particular, claim 23 as amended now specifies that the central control module is configured to "process requests for component configuration updates from a plurality of distributed components" and "determine component configuration data changes in response to the requests". As argued above in connection with claims 2 and 16, Gupta does not teach determining component configuration data changes in response to requests for component configuration updates. Since Gupta fails to disclose at least this aspect of claim 23, Gupta cannot anticipate claim 23. For at least this reason, Applicants submit that claim 23, as amended, is patentable over Gupta.

Applicants further submit that claims 24-27 and 50-51, which depend from claim 23 and which recite further advantageous aspects of the invention, are likewise patentable over Gupta for at least the reasons given above in connection with claim 23.

Independent Claim 41

Claim 41 recites:

A method for integrating distributed applications comprising:

sending requests for data-related and messaging-related configuration changes from a first host to a central host;

receiving at the first host configuration change information from the central host related to the requests for configuration changes; and

implementing at the first host data translation and messaging configuration changes according to the configuration change information.

Claim 41 sets forth a method that is performed by a distributed component (specifically, a first host) to implement changes to its own configuration. According to claim 41, the first host sends requests to a central host for data-related and messaging-related configuration changes. Upon receiving the configuration change information, the first host implements the data translation and messaging configuration changes. By doing so, the first host can dynamically and incrementally change the manner in which it translates data and processes messages.

Such a method is neither disclosed nor suggested by Gupta. In particular, Gupta does not teach "sending requests for data-related and messaging-related configuration changes". Further, Gupta does not teach "implementing at the first host data translation and messaging configuration changes". In support of his rejection, the Examiner cites Col. 11, lines 40-52 of Gupta, contending that this excerpt teaches the above limitations of claim 41. Applicants respectfully disagree.

The cited excerpt states:

Configuration requests can be generated by connectors, collaborations, interchange server objects or by the configuration tool. Configuration requests include the installation or removal of application collaboration modules and connectors; activation or deactivation of connectors or application collaboration modules; and version tracking and upgrade functions. The configuration service executes the configuration request (716) and returns an acknowledgment (or result) to the requesting object (or user) (718). Thereafter, the process continues at step 622 (FIG. 6), waiting for the next request for service.

From this excerpt, it can be seen that, in Gupta, the types of configuration requests that can be sent and executed are quite limited. The configuration requests may

request: (1) installation or removal of connectors and application collaboration modules; (2) activation or deactivation of connectors or application collaboration modules; and (3) version tracking and upgrade. These are "all or nothing" types of requests (e.g. installation or removal, activation or deactivation, upgrade or no upgrade). Unlike the requests of claim 41, these requests are not requests for configuration changes. Furthermore, they are not requests for data-related or messaging-related changes. There is nothing in Gupta, whether in this excerpt or any other portion, that teaches sending requests for data-related or messaging-related configuration changes. There is also no teaching in Gupta of implementing data translation and messaging configuration changes. Because the connectors of Gupta do not send requests for data-related or messagingrelated configuration changes, and because they do not implement data translation and messaging configuration changes, they cannot dynamically and incrementally change the manner in which they translate data and process messages (which the first host of claim 41 can achieve). Because Gupta fails to teach at least these aspects of claim 41, Gupta cannot anticipate claim 41. Thus, Applicants submit that claim 41 is patentable over Gupta.

Claim 52 is a computer readable medium counterpart of method claim 41.

Applicants submit that claim 52 is patentable over Gupta for at least the same reasons as those given above in connection with claim 41.

Independent Claim 54

Claim 54, as amended, recites:

A distributed enterprise application integration system comprising: a means for storing a central registry database used to store configuration data about a distributed enterprise application system, wherein the means for storing the central registry database is configured to process requests for configuration updates

from a plurality of means for communicating with one or more enterprise applications, determine configuration data changes in response to the requests, and forward the configuration data changes to the plurality of means for communicating with one or more enterprise applications; and

the means for communicating with one or more enterprise applications including corresponding means for implementing configuration data, the means for communicating with one or more enterprise applications stored on a plurality of computers, wherein the means for communicating with one or more enterprise applications are configured to communicate with one or more enterprise applications and perform data related and messaging activities in compliance with configuration data, and wherein the means for implementing configuration data are configured to implement configuration data changes and communicate with the means for storing a central registry database to receive configuration data changes, send requests for configuration updates, and send changes to the central registry database.

Claim 54 is somewhat similar in substance to claim 23. Like claim 23, claim 54 as amended now specifies that the means for storing a central registry is configured to "process requests for configuration updates" and "determine configuration data changes in response to the requests". As argued above in connection with claims 2, 16, and 23, Gupta does not teach determining configuration data changes in response to requests for configuration updates. Since Gupta fails to disclose at least this aspect of claim 54, Gupta cannot anticipate claim 54. For at least this reason, Applicants submit that claim 54, as amended, is patentable over Gupta.

CLAIM REJECTIONS – 35 U.S.C. §103

In the Office Action, the Examiner rejected claim 36 under 35 U.S.C. §103(a) as being unpatentable over Gupta. Claim 36 has been canceled. Therefore, Applicants request that this rejection be withdrawn.

The Examiner also rejected Claim 48 under 35 U.S.C. §103(a) as being unpatentable over Gupta in view of Butterworth (U.S. Patent No. 5,457,797). This rejection is respectfully traversed.

Claim 48 depends from claim 3, which in turn depends from independent claim 2. Thus, if claim 2 is patentable over Gupta and Butterworth, then it follows that claim 48 is also patentable over Gupta and Butterworth. As argued above, claim 2 is patentable over Gupta, taken individually, because Gupta fails to disclose at least the "determining configuration changes" limitation of claim 2. This limitation is also not disclosed by Butterworth (in fact, the Examiner makes no assertion that this limitation is shown by Butterworth). Since neither reference discloses this limitation of claim 2, even if the references were combined (assuming for the sake of example that it would have been obvious to combine the references), they would still not produce the method of claim 2. Therefore, Applicants submit that claim 2 is patentable over Gupta and Butterworth, taken individually or in combination. Applicants further submit that claim 48, which depends from claim 2, is likewise patentable over Gupta and Butterworth.

New Claims

New claims 55-61 have been added to claim the invention with the breadth and scope to which Applicants believe they are entitled. New claims 55-61 are computer readable medium claims that correspond to the method claims of claim 2-8. Applicants submit that these new claims are patentable for at least the same reasons as those given above in connection with the corresponding method claims.

Applicants believe that all issues raised in the Office Action have been addressed. For the reasons given above, Applicants believe that all of the pending claims are patentable over the art of record, including the art cited but not applied. Accordingly, allowance of all pending claims is hereby respectfully solicited.

The Examiner is invited to telephone the undersigned at (408) 414-1080 to discuss any issue that may advance prosecution.

No fee is believed to be due in connection with this response. To the extent necessary, Applicants petition for an extension of time under 37 C.F.R. §1.136. The Commissioner is authorized to charge any fees that may be due in connection with this response to Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

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Bobby K. Truong

Reg. No. 37,499

2055 Gateway Place, Suite 550 San Jose, California 95110-1089

Telephone No.: (408) 414-1080 ext. 234

Facsimile No.: (408) 414-1076

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June 13, 2006